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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$37,000.00 IN
U.S. CURRENCY,

15 Defendant.

2:20-MC-00314-TLN-DB

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17 STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Kera
Barber (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 25, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 24, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline is December 24, 2020.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
4 February 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
6 to forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be required
8 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
9 the defendant currency is subject to forfeiture shall be extended to February 22, 2021.

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11 Dated: 12/16/20

McGREGOR W. SCOTT
United States Attorney

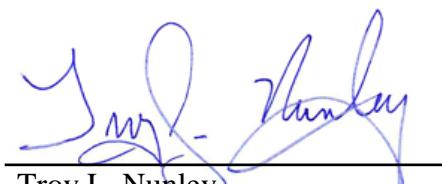
12 By: /s/ Kevin C. Khasigian
13 KEVIN C. KHASIGIAN
14 Assistant United States Attorney

15
16 Dated: 12/16/20

/s/ Jacek Lentz
JACEK LENTZ
Attorney for potential claimant
Kera Barber
(Signature authorized by email)

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21 **IT IS SO ORDERED.**

22 Dated: December 17, 2020



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Troy L. Nunley
United States District Judge